

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MARIO VENTURA AND ROSALINA VENTURA,	:	Civil Action No.:
		08-cv-02765 (LLS)
Plaintiffs,	:	
-against-	:	JUDLAU CONTRACTING, INC. RULE 26(a)(1) <u>DISCLOSURES</u>
NEW YORK CITY TRANSIT AUTHORITY,	:	
MTA NEW YORK CITY TRANSIT,	:	
METROPOLITAN TRANSIT AUTHORITY,	:	
MTA CAPITAL CONSTRUCTION COMPANY,	:	
THE CITY OF NEW YORK, and	:	
JUDLAU CONTRACTING, INC.	:	
Defendants.	:	

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Defendant JUDLAU CONTRACTING, INC. ("JUDLAU"), by its attorneys London Fischer LLP, hereby makes the following disclosures pursuant to Federal Rules of Civil Procedure ("F.R.C.P.") 26(a)(1):

I. INDIVIDUAL LIKELY TO HAVE DISCOVERABLE INFORMATION RELEVANT TO DISPUTED FACTS

The following individuals may have discoverable information relevant to the disputed facts alleged in the pleadings. JUDLAU reserves its right to supplement its disclosure upon identifying any additional individuals who may have discoverable information.

1. Dennis Samuel (JUDLAU's Safety Engineer).
2. Dave Frank (JUDLAU's Project Manager).
3. Satmire Kastri (JUDLAU's Project Manager).
4. Additional employees and/or agents of JUDLAU.
5. Employees and/or agents of New York City Transit Authority.
6. Employees and/or agents of MTA New York City Transit.

7. Employees and/or agents of Metropolitan Transit Authority.
8. Employees and/or agents of MTA Capital Construction Company.
9. Employees and/or agents of the City of New York.
10. Employees and/or agents of Schiavone Construction Co.
11. Any "knowledgeable" individuals learned as discovery progresses.
12. Any individuals listed by any other party to this lawsuit.

**II. LISTING, DESCRIPTION AND LOCATION OF DOCUMENTS,
DATA COMPILATIONS AND TANGIBLE THINGS.**

JUDLAU is not in possession of any documents relevant to the instant matter at this time.

JUDLAU reserves the right to supplement or amend this Disclosure with any additional relevant documents not previously exchanged between the parties.

III. DAMAGES CLAIMED

Not applicable.

IV. INSURANCE AGREEMENT

At the time of Plaintiff's alleged accident, JUDLAU had in place policy no. GL 03867012-00. The insurer is Zurich North America. The policy will be provided under separate cover.

V. EXPERT DISCLOSURE

1. JUDLAU will identify testifying experts when such experts are selected.

Dated: New York, New York
July 17, 2008

LONDON FISCHER LLP

By:

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